

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:

**THE MCCLATCHY COMPANY, *et al.*,
Debtors.**

:
:
: **Chapter 11**
:
: **Case No. 20-10418 (MEW)**
:
: **Jointly Administered**
:
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**NOTICE OF APPEARANCE AND
DEMAND FOR NOTICE AND FOR SERVICE OF PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appears as Counsel for The Bank of New York Mellon Trust Company, N.A. ("**BNY Mellon**") in the above-referenced chapter 11 proceeding, pursuant to Bankruptcy Rules 2002 and 9010(b), and requests that all notices given or required to be given in these cases, and all papers served or required to be served in these cases, be given to and served upon the undersigned attorneys, or on its behalf, at the addresses set forth below:

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PLEASE TAKE FURTHER NOTICE that this Notice of Appearance and Request of Service of Papers includes not only the notices and papers referred to in the Bankruptcy Rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleadings, request, complaint, or demand, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, courier service, hand delivery,

telephone, facsimile transmission, telegraph, telex, or otherwise that (1) affects or seeks to affect in any way any rights or interests of any creditor or party-in-interest in this case, including, with respect to: (a) the debtors; (b) property of the estates, or proceeds thereof, in which the debtors may claim an interest; or (c) property or proceeds thereof in the possession, custody or control of others that the debtors may seek to use; or (2) requires or seeks to require any act, delivery of any property, payment, or other conduct.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim, or suit is intended or shall be deemed to waive BNY Mellon's (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn in any matter subject to mandatory or discretionary withdrawal; (iv) right to enforce any contractual provisions with respect to arbitration; or (v) other rights, claims, actions, defenses, setoffs, or recoupments to which BNY Mellon has or may be entitled under agreements, in law, or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments are expressly reserved.

Dated: February 13, 2020

By: /s/ Thomas A. Pitta
Thomas A. Pitta